Title III licenses for this special "service option," the Commission remains statutorily bound to protect those licensees and their subscribers. Where record evidence shows that a company like Capitol poses a direct, unnecessary threat to individualized PCP service, the FCC must fashion appropriate relief in the public's interest on a case-by-case basis. See 47 C.F.R. § 90.173(b).

In this case, adequate relief is available, and can be readily obtained. RAM is not "seek[ing] to exclude competition," cf. Capitol Opposition at 2, rather, it is welcoming competition that does not cause unnecessary harmful interference to existing PCP users. If Capitol really wants to "compete" as a PCP service company, it could not honestly have any objections to competing on a perfectly "fungible," virtually unused, high power PCP frequency.

III. NABER Has Agreed to Reconsider its Frequency Recommendation at the Commission's Request.

Capitol contends that "there is thus no reason for NABER's recommendation to be disturbed or justified further" (Capitol Opposition at 2). Capitol has ignored the fact that NABER has already expressed its willingness to review the changed circumstances in this proceeding to determine if a more appropriate frequency could be assigned to Capitol. (See RAM Petition at 5).

Capitol has had ample opportunity to explain why it should prefer the 152.480 frequency over the high-power 157.740 frequency; yet, it has conspicuously failed to do so. In truth, Capitol would have to admit that the frequencies are identical, with the

exception that 157.740 is far less congested than 152.480. Thus, the FCC has no reason to believe that Capitol's preference is legitimate, reasonable, or in the public's interest.

RAM reasoned that "it simply makes no sense to risk interference to thousands of subscribers on the 152.480 frequency" now that an additional high power frequency is virtually unused and available. (RAM Petition at 5). Capitol made no attempt to explain why its preference "makes sense." The simple fact is: it doesn't.

Because of changed circumstances in this proceeding, the Commission can easily provide interference protection to thousands of subscribers on 152.480 systems in the subject service areas by a simple exercise of its Title III licensing authority: the Commission should ask NABER to update its frequency recommendation to recommend that Capitol be licensed on the high power 157.740 frequency.

CONCLUSION

WHEREFORE, for all the foregoing reasons, RAM Technologies respectfully requests that the Commission notify NABER of the changed circumstances in this proceeding, and request an updated frequency recommendation consistent with this Petition.

Respectfully submitted,

RAM TECHNOLOGIES

By: Frederick M. Joyce

Its Counsel

JOYCE & JACOBS 2300 M Street, N.W.

Eighth Floor

20037 Washington, D.C.

Date: September 21, 1990 (202) 457-0100

CERTIFICATE OF SERVICE

I, Frederick M. Joyce, do hereby certify that on 21st day of September, 1990, copies of the foregoing Reply to Opposition to Petition for Reconsideration were mailed, postage prepaid, to the following:

Ralph Haller, Chief Private Radio Bureau Federal Communications Comm. 2025 M Street, NW, Room 5002 Washington, D.C. 20554

Jay Kitchen, President National Association of Business & Educational Radio 1501 Duke Street, Suite 200 Alexandria, VA 22314

Richard J. Shiben, Chief Land Mobile & Microwave Division Private Radio Bureau Federal Communications Comm. 2025 M Street, N.W., Room 5202 Washington, D.C. 20554

Terry L. Fishel, Chief Land Mobile Branch Private Radio Bureau Federal Communications Comm. Gettysburg, PA 17326

Kenneth E. Hardman, Esq. 2033 M Street, N.W. Suite 400 Washington, D.C. 20036

Frederick M. Joyce

-1004 LONGWORTH BUILDING WASHINGTON, DC 20515 (202) 225-4935 EDUCATION AND LABOR
SCIENCE, SPACE, AND TECHNOLOGY

Congress of the United States Bouse of Representatives

Mashington, BC 20515

September 10, 1990



ORIGINAL

Ralph A. Haller, Chief Private Radio Bureau Federal Communications Commission Washington, D.C. 20554

RE: Capitol Radiotelephone PCP Application

File #0190207

Dear Mr. Haller:

I am writing to you on behalf of my constituent, RAM Technologies, Inc., a Kentucky corporation, concerning a problem within the Federal Communications Commission's jurisdiction. Having met with the President of the company, Mr. Robert A. Moyer, Jr., and having reviewed the facts in this matter, I firmly believe that the FCC can readily resolve this problem to everyone's benefit.

RAM Technologies operates a private carrier paging system, based in Ashland, KY, which serves over 7000 customers throughout Kentucky, Ohio, and West Virginia. The service is licensed by the FCC on a shared private radio frequency, although that frequency is already highly congested with paging customers. RAM had opposed a grant of that license because of evidence that Capitol, which is already licensed on "clear" common carrier frequencies, in-tended to cause harmful interference to RAM's service. Despite that evidence, and despite congestion on the frequency, the FCC apparently granted Capitol's application by letter dated August 9, 1990 (attached hereto).

Although it is possible that Capitol will eventually comply with its legal obligation to avoid causing harmful interference to co-channel licensees, I would rather see the FCC take action to ensure that such harm does not occur in the first place. Certainly, the FCC has a statutory obligation under Title III of the Communications Act of 1934 to "prevent interference between stations." 47 U.S.C. 303 (f). It is my understanding that, due to recent FCC rule

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revisions, a ready solution is available.

Apparently, the FCC recently amended its rules to allow high power paging operations on the 157.740 MHz frequency. Consequently, that frequency is now comparable to the 152.480 frequency in every way. It is also my understanding that the 157.740 frequency has very little air "traffic" on it.

RAM Technologies has filed a Petition for Reconsideration with the Commission requesting that Capitol be assigned a license on that underutilized frequency. This strikes me as an eminently appropriate action to take to protect thousands of customers from suffering a degradation of their paging service, while enabling Capitol to provide service on a high power paging frequency.

Sincerely,

Carl C. Perkins, M.C.

CCP:cm

cc: Kenneth E. Hardman, Esq.
(Counsel for Capitol Radiotelephone)
Frederick M. Joyce, Esq.
(Counsel for RAM Technologies, Inc.)

LAW OFFICES

KENNETH E. HARDMAN, P.C.

ORIGINAL

Telecomer (202) 331-0174

OF COUNSEL: Knopp & Burka W. Randolph Young 2033 M STREET, N.W. SUITE 400 WASHINGTON, D.C. 20036 (202) 223-3772

December 4, 1990

Ms. Donna R. Searcy Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554 RECEIVED

DEC 4 - 1990

Federal Communications Commission
Office of the Secretary

Attention:

Ms. Carol Fox Foelak, Chief

Compliance Branch Private Radio Bureau

Dear Ms. Searcy:

This afternoon I received in the mail a copy of a letter dated November 28, 1990, from Frederick M. Joyce, counsel for RAM Technologies, Inc. to Ms. Carol Fox Foelak. In that letter RAM makes certain allegations of misconduct by my client Capitol Radiotelephone Company, Inc. d/b/a Capitol Paging. The letter was delayed in arriving at my office because it was sent to an incorrect address, despite the fact that my correct address is reflected in the record in the proceedings in File No. 0190207, in which Mr. Joyce is contesting the grant of a PCP license on 152.48 to Capitol Paging, and which is also the subject in part of Mr. Joyce's letter.

In any event, Capitol Paging absolutely and categorically denies RAM's allegations. See copy of the Declaration of J. Michael Raymond annexed hereto. Further, Capitol Paging recommends that the Commission investigate whether principals or agents of RAM have either fabricated their allegations of misconduct entirely, or are themselves culpable of the misconduct they ascribe to Capitol. This is a very serious matter and Capitol strenuously urges the Commission to investigate fully and severely punish the culpable party, whether it is Mr. Moyer or someone else.

very drury yours,

KENNETH E. HARDMAN, P.C.

cc: Mr. Richard J. Shiben

Ms. Carol Fox Foelak Mr. Jerold Feldman

Frederick M. Joyce, Esquire

Federal Communications Commission						
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DECLARATION OF J. MICHAEL RAYMOND

My name is J. Michael Raymond, and I am a Vice President and Chief Operating Officer of Capitol Radiotelephone Company, Inc. d/b/a Capitol Paging, whose principal offices are located at 1420 Kanawha Boulevard East, Charleston, West Virginia 25301. I have read the letter to Carol Fox Foelak dated November 28, 1990 from Frederick M. Joyce, counsel for RAM Technologies, Inc., together with the affidavits of Robert A. Moyer, Jr., Raymon A. Bobbitt and Forrest A. Collier attached thereto. In that letter RAM accuses Capitol Paging of having retransmitted paging messages from its Radio Common Carrier system on 152.51 MHz onto the Private Carrier Paging frequency 152.48 MHz in the Charleston area during the period Thursday, November 15, 1990 through Sunday, November 18, 1990, and having otherwise interfered with RAM's transmissions.

RAM's allegations that Capitol Paging has retransmitted traffic from 152.51 MHz to 152.48 MHz and has otherwise interfered with RAM's transmissions, or that someone acting on Capitol Paging's behalf has done so, are absolutely and categorically false. Quite to the contrary, in my opinion, if in fact such interference occurred as claimed by RAM, most likely the person who did so was commissioned for the task by RAM or its owner in an attempt to lend credence to RAM's prior claims in opposition to Capitol's PCP license application.

I do agree with RAM that serious misconduct has evidently occurred in this matter, and that the FCC should immediately investigate and severely punish the culpable party. However,

neither Capitol Paging nor anyone under its control is responsible for such misconduct.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of December 1990.

. Michael Raymond

ORIGINAL

LAW OFFICES OF

KNOPF & BURKA

2033 M STREET, N. W.

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SEUKETARY

TELECOPIER (202) 331-0174

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SILVER SPRING, MD 20910

ROBERT A. BURKA NORMAN G. KNOPF* DAVID W. BROWN BARRY S. SHANOFF+ SUSAN G. GOLDBERG+ DENNIS M. CATE+ *ALSO ADMITTED IN MARYLAND *ADMITTED IN MD. & VA. ONLY

(202) 785-8200

Writer's Direct Dial: KENNETH E. HARDMAN (202) 223-3772 OF COUNSEL

March 15, 1991

Ms. Donna R. Searcy Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554

> Attention: Carol Fox Foelak

> > Chief, Compliance Branch

Land Mobile and Microwave Division

Private Radio Bureau

Re: 7320-02/LJF-90038

Dear Ms. Searcy:

Enclosed herewith is the Declaration of J. Michael Raymond denying the material allegations of interference contained in the complaint by RAM Techologies, Inc. dated March 5, 1991. The Declaration shows, in substance, that the complaint is no more than another trumped up charge by RAM.

The response to RAM's complaint was delayed until today, so that current information also could be provided in the Declaration concerning interference caused by RAM's transmissions. Also enclosed is the Declaration of Calvin R. Basham pointing out RAM's history of causing harmful interference to co-channel licensees on 152.48 MHz in the Charleston area.

It should be evident by this time that RAM has no intention of complying with the Commission's rule that 152.48 MHz is available only on a shared basis to licensees, and that RAM likewise has no intention of cooperating with co-channel licensees to minimize or avoid interference to each other. To the contrary, it is apparent that RAM has embarked on a deliberate, calculated campaign to drive other licensees off the channel in an attempt to secure protected status for the channel comparable to that afforded radio common carriers under Part 22 of the rules.

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Ms. Donna R. Searcy March 15, 1991 Page Two

RAM obviously is not lawfully entitled to such protection. If RAM is unwilling to comply with the rules that \underline{do} apply to its use of the channel, it should forfeit its license.

As a separate matter, I am in receipt of a letter dated March 7, 1991 from Mr. Haller to Congressman Perkins, which adverts to an inquiry from the Congressman that apparently triggered the March 7 letter. I was not served with a copy of any inquiry by the Congressman and have never received any such copy. I call this matter to your attention so that if the ex parte communication was improper, you may take such action as is appropriate.

Very truly yours,

CAPITOL RADIOTELEPHONE COMPANY, INC. d/b/a CAPITOL PAGING

Βv

Kenneth E. Hardman, P.C.

Its Attorney

Enclosures

cc: Frederick M. Joyce, Esquire

DECLARATION OF J. MICHAEL RAYMOND

My name is J. Michael Raymond. I am a Vice President of Capitol Radiotelephone Company, Inc. d/b/a Capitol Paging (Capitol Paging), with its principal office at 1420 Kanawha Boulevard East, Charleston, West Virginia. Capitol Paging is the licensee of WNSX646, a private carrier paging station operating on 152.48 MHz in Charleston and Huntington, West Virginia. I have reviewed the Declaration of A. Dale Capehart dated March 5, 1991, concerning an alleged incident of interference to RAM Technologies, Inc., and the letter to the FCC dated March 5, 1991 from Frederick M. Joyce, to which the Capehart Declaration was attached.

For the past several weeks, while Capitol Paging was modifying a terminal and installing control facilities for its PCP system, Capitol's base station transmitters on 152.48 MHz in Charleston and Huntington have been equipped to automatically identify themselves in accordance with FCC rules. Identification occurs every 15 minutes, and takes no more than a second of time to accomplish. No change to this situation had occurred by March 4, 1991 when Capehart called me to complain about our transmitter ID supposedly causing interference to RAM's paging transmissions.

Although RAM personnel in general, and Capehart in particular, can be extremely difficult and often unpleasant to deal with, I attempted to be cooperative and to try to resolve Capehart's problem. The upshot of my conversations with Capehart on March 4 was that I agreed to try to get a technician

out to the Huntington transmitter that day. However, I was unable to do so. Therefore, since Capehart states in his declaration that the interference problem was fixed by about 7:30 p.m. the night of March 4, it is obvious that the claimed interference was not actually caused by Capitol Paging in the first place.

Also, since the ID transmission takes only a fraction of a second to begin with, it is impossible to understand how any such transmission could have "caused serious damage to RAM's PCP's service by blocking transmissions and causing the loss of paging messages," as claimed in Mr. Joyce's letter. In fact, if a transmitter ID comes on during a paging, only a small portion of the page receives any static; the page itself is not wiped out. Furthermore, RAM's transmitters on 152.48 MHz are much more powerful than Capitol Paging's transmitters, which is another reason it is virtually impossible that Capitol Paging could have caused the type of interference claimed by RAM.

It is also absolutely ludicrous that RAM should complain about interference from Capitol Paging or any other co-channel licensee, because it is <u>RAM</u> that systematically interferes with transmissions by other licensees on 152.48 MHz. Attached hereto is a statement by Calvin R. Basham attesting to the fact that when his company, Communication Service, Inc. (CSI) attempted to build up a PCP paging business on 152.48 in the Charleston area, RAM kept interfering CSI's pages to the point that all of CSI's customers were driven off of the channel.

Capitol Paging also is being victimized by interference from RAM's transmitters on 152.48 MHz. Capitol Paging initiated its PCP service on 152.48 MHz on Tuesday, March 12, 1991. Since that time and continuing to date, RAM has repeatedly initiated paging transmission while a page by Capitol Paging is in progress. In addition, RAM has also respeatedly tied up the channel for as much as 15 minutes continuously at a time, and has failed to shut its transmitters down after three minutes as required by FCC rules. This is another form of interference because it blocks Capitol's pages from being transmitted.

The Commission should also be aware that Capehart put in an emergency call to me on Saturday morning March 9, 1991, about 8:00 a.m., to complain about some interference to RAM's PCP transmissions from a religious broadcasting station. (Why he felt impelled to put in an emergency call to me on a Saturday morning when he knew that Capitol was not responsible for his problem was never explained). In any event, during the course of that conversation, Capehart admitted that RAM has taken its off-the-air monitor off of its PCP system so that RAM could blot out the claimed interference.

I advised him at that time that Capitol would be starting its PCP paging service on 152.48 MHz on Monday, March 11, 1991, and that I expected RAM to have its off-the-air monitoring equipment fixed and functioning by Monday morning. As it turned out, Capitol Paging was not able to start service until Tuesday morning, March 12, but it was evident at that time that RAM still had not put its monitoring equipment back on its system.

Because of the interference to Capitol Paging's transmissions which was being caused by RAM's transmissions, I called Capehart on Tuesday to try to get the interference stopped. Capehart absolutely refused to cooperate, and instead became belligerent, abusive and profane. RAM's interference to Capitol's transmissions continues, and it is evident that RAM still has not put its inhibitors back on its system.

I have also investigated Capehart's claim that a Capitol Paging salesperson predicted that RAM would have problems with their paging system starting March 4. So far as I have been able to determine, the claimed incident did not happen and is a fabrication by RAM as well.

RAM's behavior to date makes it clear that it has no intention of permitting any co-channel licensee to share the use of 152.48 MHz in the Charleston area, even though it is required to do so by FCC rules. Since it has demonstrated a repeated unwillingness to abide by FCC rules, its license to operate should simply be revoked.

I declare under penalty of perjury that the foregoing is true and correct. Executed this _____ day of March, 1991,

J. Michael Raymond

DECLARATION OF CALVIN R. BASHAM

My name is Calvin R. Basham, and I am President of Communication Service, Inc. (CSI), Charleston, West Virginia. Among other things, CSI is a Private Carrier Paging system licensed for 152.48 MHz in Charleston and four other sites on station WNLM930. I am aware that RAM Technologies has complained to the FCC that Capitol Paging allegedly caused interference to RAM's paging transmissions on 152.48 MHz; and I wanted to remind the FCC of my experience on that channel with interference by RAM.

CSI attempted to use WNLM930 to build up a private carrier paging business in the Charleston area. However, more than a year ago, when RAM Technologies started operating on the same channel, RAM started interfering with CSI's pages. RAM repeatedly started transmitting its own pages when CSI's transmitter was in the middle of transmitting a CSI page; and RAM would transmit pages continuously for several minutes at a time, far more than the three minutes permitted by FCC rules. The effect of this was to block CSI's transmitters — which were properly equipped with inhibitors — from going on air with CSI pages, thereby making it virtually impossible for CSI's customers to use its system. As a result of RAM's interference, CSI lost all of its customers on 152.48 MHz.

I complained to the FCC about RAM's interference at the time. However, the only response was a suggestion by Mr. Jerry Franz that RAM and CSI try to cooperate with each other. What the FCC has to realize, however, is that RAM has never shown any

inclination to cooperate with <u>any</u> co-channel licensee. Instead, it is not satisfied unless it has the entire channel to itself. Based on my own experience with RAM, it is ridiculous that RAM should be accusing someone else of interference. So far as I am aware, it is RAM and only RAM that has been causing interference in the Charleston area on 152.48 MHz.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed the 1474 day of March, 1991.

Calvin R. Basham



ORIGINAL

March 19, 1991

Mr. Mike Raymond Capitol Paging 1420 Kanawha Blvd., East Charleston, WV 25301

Dear Mike:

This letter is to confirm our conversation today. While both our paging systems are busy-out monitoring, there is still the possibility of collisions as you heard today. This happens when both transmitters begin to transmit simultaneously.

We can reduce the possibility of this happening by wire-line connecting our paging terminal with yours. As I told you on the phone we wo'd be glad to have our engineer talk to yours and work this. We would have to rent a phone line from Charleston, West Virginia to Ashland, Kentucky and each pay half.

Please let me know if I can be of further assistance.

Sincerely

Of Dale Capehart

A. Dale Capehart

Sales Manager

ADC/tlw

Federal Co	emmunications Commission
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DIVISIONS:INCLUDING:

LAW OFFICES OF

KNOPF & BURKA

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MARYLAND OFFICE 8701 GEORGIA AVENUE SUITE 200 SILVER SPRING, MD 20910

Writer's Direct Dial: (202) 223-3772

April 3, 1991

Mr. Richard J. Shiben, Chief Land Mobile and Microwave Division Private Radio Bureau Federal Communications Commission 2025 M Street, N.W., Room 5202 Washington, D.C. 20554

Dear Mr. Shiben:

3 3

KENNETH E. HARDMAN, P. C.

OF COUNSEL

In our meeting yesterday, I understood you and Mr. Joyce to say that there is no rule limiting the duration of private carrier paging transmissions to three minutes at a time. The rule which I had in mind is Section 90.483(d), which states, in pertinent part:

A timer must be installed at the base station transmitter which limits communications to three (3) minutes. After three (3) minutes, the system must close down, with all circuits between the base station and the public switch telephone network disconnected.

I would appreciate your clarification of what this rule means in the RAM/Capitol situation, especially in light of your injunction to both parties to operate in strict compliance with the rules. There is apparently some considerable confusion on this matter, because I am also advised that NABER informed Capitol during the coordination process that this rule required it to limit base transmissions to three minutes at a time.

Thank you for your assistance in this matter.

Very truly yours,

KENNETH E. HARDMAN, P.C.

cc: Frederick M. Joyce, Esquire Carol Fox Foelak, Esquire Jerold Feldman, Esquire

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FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

May 14, 1991

IN REPLY REFER TO:

Kenneth E. Hardman, P.C. Knopf & Burka 2033 M Street, N.W. Suite 400 Washington, D.C. 20036

Dear Mr. Hardman:

You have made inquiry about our interpretation of the "three minute rule", Section 90.483(d). Section 90.483 deals exclusively with interconnected systems of communications. The three minute rule is directed specifically to the situation of interconnected service and its purpose is to limit the length of interconnected calls in order to minimize the likelihood of channel congestion. From our understanding of the RAM and Capitol paging systems as discussed at the April 2, 1991 meeting, it appears that these systems are not interconnected and that, therefore, Section 90.483 would not apply.

This is not to say, however, that there are no restrictions in the Rules pertaining to how paging systems are to share their channels with other users. Specifically, Section 90.173(b) requires licensees to cooperate in the use of frequencies in order to reduce interference and make the most effective use of the authorized facilities. Section 90.403(c) requires that each licensee restrict all transmissions to the minimum practical transmission time and employ an efficient operating procedure designed to maximize the utilization of the spectrum. And Section 90.403(e) requires that licensees take reasonable precautions to avoid causing harmful interference, including but not limited to monitoring the transmitting frequency for communications in progress.

It should be clear from these various rule sections that licensees are expected to cooperate fully in the use of shared channels by taking all reasonable precautions not to cause harmful interference to other transmissions and to use the spectrum in an efficient manner.

Sincerely,

Richard J. Shiben

Chief, Land Mobile and Microwave Division

Copy To: Mr. Frederick M Joyce, Esquire

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RADIO STATION LICENSE

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COMMUNICATIONS COMMISSION

CAPITOL RADIOTELEPHONE COMPANY INC DBA

CAPITOL PAGING MIKE RAYROND

1420 KANSWHA BLVD E

CHARLESTON

25301

This eatherization becomes invalid and must be returned in the commission if the seations are not pleased in operation within eight mention, amisses an extension of time has been granted. EXCEPTION: 800 MHz trunked and certain 900 MHz station licenses cancel automatically if not constructed within one year.

PAGF

FCC 5 JULY